

EXHIBIT A

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In Re Flint Water Cases

Case No. 16-cv-10444
Hon Judith E. Levy
United States District Judge

/

DECLARATION OF PASTOR KEVIN THOMPSON

Pursuant to 28 U.S.C. § 1746, I, Kevin Thompson, hereby declare as follows:

1. I am a Flint, Michigan resident, the Pastor of the St. Mark Baptist Church of Flint and an advocate for the residents of Flint.
2. I am a plaintiff in the Flint Water Litigation and am represented by Napoli Shkolnik, Co-Liaison Counsel for this Litigation.
3. On February 6, 2024, a gentleman by the name of Paul Persaud called my Church seeking to speak to me. I was unavailable and the call was taken by my assistant. On that date I was, and still am, a client of Napoli Shkolnik.
4. The message relayed to me was that Paul Persaud identified himself as being from the New York Post seeking commentary on the 10th Anniversary of the Flint water tragedy for an article being published by the New York Post.
5. I later determined that Mr. Persaud was not with the New York Post but is Vice President with a company named Actum LLC a strategy consulting firm. I now know this company has been engaged by Veolia yet Mr. Persaud did not advise my office of this.
6. To be clear, we were lead to believe this individual was a reporter for the New York Post.
7. I was then subsequently contacted as a follow up to Mr. Persaud's call to appear on a Podcast, again, to discuss my thoughts on the 10th

anniversary of the Flint water crisis. I was not advised I was going to be asked about Mr Stern or comments he made in the past.

8. I had never heard any of the comments attributed to Mr. Stern before being confronted with them during the podcast.
9. I did know Mr. Stern is one of the few lawyers still fighting for Flint residents against Veolia.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 12, 2024
Flint, Michigan

/s/ Kevin Thomson
Pastor Kevin Thompson